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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JASON MATHIS, an individual,

Plaintiff

vs.

JACOB HOLGUIN, an individual; SAM QADERI, an individual; INGRID TRASCAN, an individual; CAREN QUIBA, an individual and DOE CORRECTIONAL OFFICER 5,

Defendants

MDC
Case. No.: 2:20-cv-02171-CDS-VCF

STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
PLAINTIFF'S RESPONSE IN
OPPOSITION TO MOTION FOR
SUMMARY JUDGMENT

(FIRST REQUEST)

[ECF No. 67]

Plaintiff Jason Mathis and Defendants Jacob Holguin, Ingrid Trascan, Sam Qaderi, and Caren Quiba, by and through their respective legal counsel (collectively the "Parties") hereby stipulate to the following:

1. On August 5, 2024, Defendants moved for summary judgment. (ECF No. 66);

2. The deadline for Plaintiff's Response in Opposition to the Motion for Summary Judgment is currently August 26, 2024;

3. Due to various competing deadlines and family emergencies, Counsel for Plaintiff has not had sufficient time to review Defendants' Motion for Summary Judgment and supporting exhibits in order to adequately prepare a Response, and therefore, is unable to meet the August 26, 2024, deadline;

4. Specifically, Pieter O'Leary, who was heavily involved in litigating this matter, left McLetchie Law in May 2024, increasing the workload for remaining attorneys

1 and staff.

2 5. Furthermore, Ms. McLetchie's mother passed away on July 29, 2024,
 3 requiring Ms. McLetchie to devote substantial time away from legal work to plan and host
 4 her memorial, wind up her affairs, and deal with her estate.

5 6. Finally, Ms. McLetchie and Mr. Wolpert will be traveling out of the
 6 jurisdiction with limited access to the Internet between August 24, 2024, through September
 7 2, 2024.

8 7. The Parties have met and conferred and agree that the deadline for Plaintiff
 9 to file his Reply shall be extended by thirty (30) days;

10 8. Accordingly, the deadline for Plaintiff's ~~Reply in Support of Plaintiff's~~
 11 ~~Motion for Leave to File a First Amended Complaint~~ shall be rescheduled from August 26,
 12 2024, to September 25, 2024;

13 9. This is the Parties' first request for an extension of this deadline.

14 10. The Parties both submit that the instant stipulation is being offered in good
 15 faith and not for the purpose of delay.

17 **IT IS SO STIPULATED.**

19 Dated this 23rd day of August, 2024.

19 Dated this 23rd day of August, 2024.

20 **MCLETCHE LAW**

20 **OFFICE OF THE ATTORNEY
GENERAL**

22 By: /s/ Leo S. Wolpert

23 Margaret A. McLetchie, Esq.
 24 Nevada Bar No. 10931
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22 By: /s/ Victoria C. Corey

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*Attorneys for Defendants Jacob
 Holguin, Ingrid Trascan, Sam
 Qaderi, and Caren Quiba*

ORDER

Based on the parties' stipulation, the deadline for plaintiff's response in opposition to the motion for summary judgment is extended to September 25, 2024. The reply is now due on October 2, 2024.

Dated: August 26, 2024

UNITED STATES DISTRICT JUDGE



John H. Dugan

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